

Murray, Annah

From: Anderson, Chad <Chad.Anderson@jebro.com>
Sent: Tuesday, November 16, 2021 10:48 AM
To: Murray, Annah
Cc: Wilt, Lester
Subject: Risk Based Application
Attachments: EPA Risk Based Application.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Annah –

Please find attached, for your review and distribution, Jebro's risk based application for the alternative decontamination and sampling of the transfer line/pipe and connected holding tanks. We continue to receive favorable PCB analysis results back on a daily basis, but I thought it best to get the application sent out now to get the process rolling.

In addition to the 26 PCB sampling results enclosed herein, we have also conducted another 32 PCB spot checks and I'm happy to report all of them have come back at less than 1ppm PCB Content. The only result greater than 2ppm PCBs is a section of transfer pipe that we are not surprised about.

Lastly, Amerapex Services Group is preparing to dispatch a pipe cleaning team to our facility to decontaminate the section of transfer pipe that we know to be contaminated with PCBs. Please let me know if you see any issues with their proposal (see Appendix E).

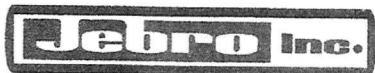
Please don't hesitate to call me with any questions or concerns.

Thanks - Chad

RCRA



602403



November 15, 2021

U.S. Environmental Protection Agency
Office of the Regional Administrator
Attn: Ms. Annah Murray
11201 Renner Blvd.
Lenexa, KS 66219

RE: Risk Based Application for Alternative PCB Decontamination

Ms. Murray,

At this time, Jebro Incorporated would like to apply for an alternative PCB decontamination method for our facility based in Sioux City, IA.

The material to be alternatively decontaminated consists of used oil storage tanks, sections of used oil transfer pipe, a used oil loading rack, and a used oil unloading rack.

Since first detecting PCBs in the used oil in our large storage tank (Tank 36) on October 1st, 2021 our Sioux City, IA facility has received 346,448 gallons of used oil. All these gallons of used oil were unloaded at Rack 20 and transferred to one of five receiving tanks. They are then transferred to one of four finish tanks and then ultimately to either Tank 19 or to our used oil loading rack (Rack 2).

Given that 346,448 gallons of used oil has been received in the facility since Oct 1st, with no test results revealing the presence of PCBs, we are seeking a reasonable and favorable alternative decontamination determination that the used oil tanks, certain sections of transfer lines, and racks be considered alternatively decontaminated. This request does not include Tank 36 or the used oil transfer line between Tank 4 and Tank 36, which we know to be contaminated with PCBs. The section of PCB contaminated transfer line and Tank 36 will be cleaned by Amerapex Corporation.

Please don't hesitate to email me at chad.anderson@jebro.com or contact me at 712-490-3707 with any questions or concerns.

Thank you,

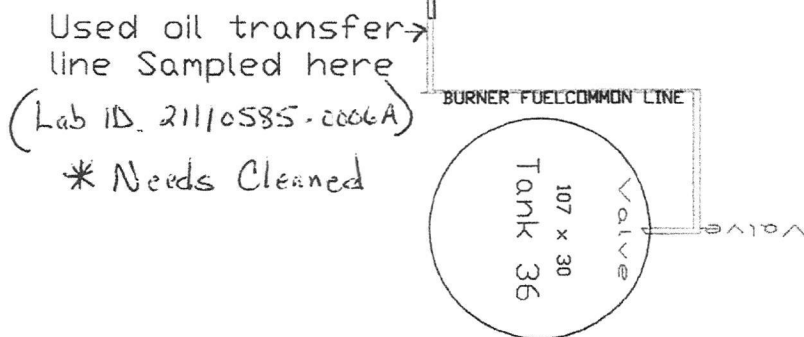
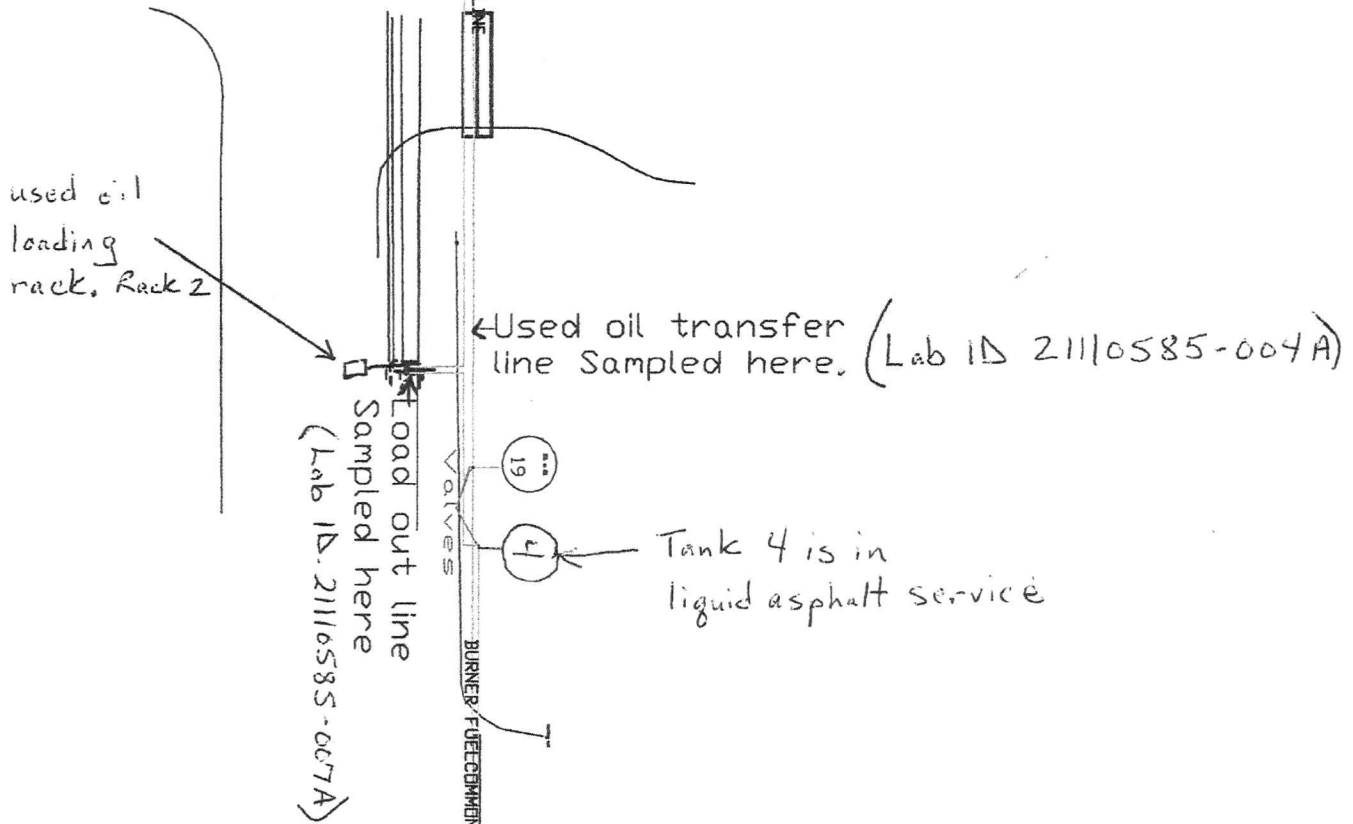
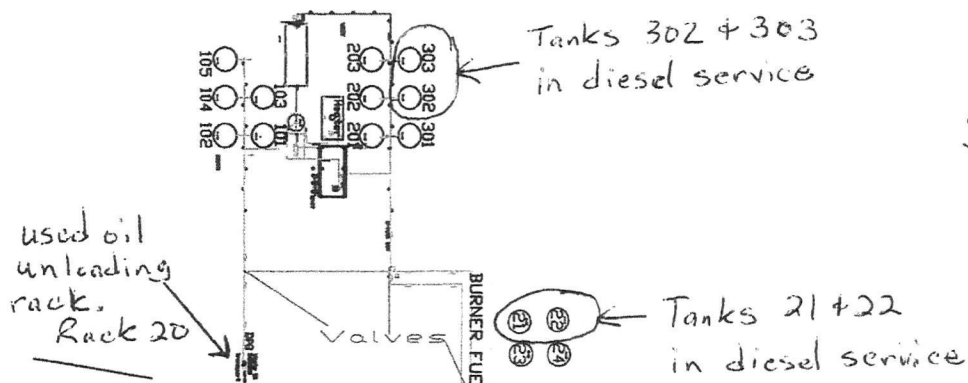
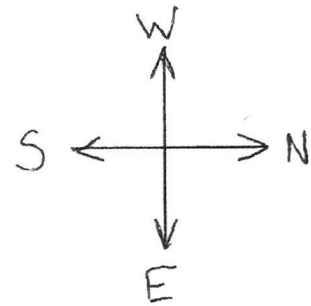
A handwritten signature in black ink that reads 'Chad Anderson'. The signature is written in a cursive, flowing style.

Chad Anderson
GM of Heavy Fuel Oils
Jebro Incorporated
2303 Bridgeport Drive
Sioux City, IA 51111

Appendix A: Facility diagram
Appendix B: PCB test results of used oil storage tanks
Appendix C: PCB test results of used oil loadouts at Rack 2
Appendix D: PCB test results of used oil transfer lines/pipes
Appendix E: Amerapex transfer line/pipe decontamination outline

Appendix

A



Appendix

B

Storage Tank PCB Content Results

Tank #	Collection Date	PCB Content Result
19	11/3/2021	< 1.00 PPM
19	11/10/2021	< 1.00 PPM
101	11/3/2021	< 1.00 PPM
101	11/10/2021	< 1.00 PPM
102	11/2/2021	< 1.00 PPM
103	11/3/2021	< 1.00 PPM
103	11/3/2021	< 1.00 PPM
104	11/12/2021	< 1.00 PPM
105	11/10/2021	< 1.00 PPM
201	11/3/2021	< 1.00 PPM
202	11/3/2021	< 1.00 PPM
203	11/4/2021	< 1.00 PPM
301	11/3/2021	< 1.00 PPM
Process Tank	11/10/2021	< 1.00 PPM



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Website: <http://www.settek.com>

Analytical Report

(base report)

WO#: 21110238

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110238-001A
Project:
Client Sample ID Tank 19

Tag Number:
Collection Date: 11/3/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082			Analyst: JAP	
Total PCBs	< 1.00	1.00		ppm	1	11/4/2021 11:54:00 AM
Surr: Tetrachloro-m-xylene	68.6	67.8 - 130		%Rec	1	11/4/2021 11:54:00 AM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110805

Date Reported: 11/12/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110805-002A
Project:
Client Sample ID RFO5L/H, tk 19

Tag Number:
Collection Date: 11/10/2021 1:30:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082	Analyst: JAP	
Total PCBs	< 1.00	1.00		ppm	1	11/12/2021 12:57:00 PM
Surr: Tetrachloro-m-xylene	76.3	67.8 - 130		%Rec	1	11/12/2021 12:57:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range	Original
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response	
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds	
	ND	Not Detected	OGI		
	P	Second column confirmation exceeds	PL	Permit Limit	
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Analytical Report

(base report)

WO#: 21110238

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110238-005A
Project:
Client Sample ID Tank 101

Tag Number:
Collection Date: 11/3/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082	Analyst: JAP	
Total PCBs	< 1.00	1.00		ppm	1	11/4/2021 12:31:00 PM
Surr: Tetrachloro-m-xylene	71.9	67.8 - 130		%Rec	1	11/4/2021 12:31:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range	Original
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response	
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds	
	ND	Not Detected	OG1		
	P	Second column confirmation exceeds	PL	Permit Limit	
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Analytical Report

(base report)

WO#: 21110805

Date Reported: 11/12/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110805-004A
Project:
Client Sample ID ULO tk 101

Tag Number:
Collection Date: 11/10/2021 1:45:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082		Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/12/2021 1:31:00 PM
Surr: Tetrachloro-m-xylene	89.0	67.8 - 130		%Rec	1	11/12/2021 1:31:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range	Original
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response	
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds	
	ND	Not Detected	OGI		
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Analytical Report

(base report)

WO#: 21110153

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.

Matrix: OIL

Lab ID: 21110153-001A

Project:

Client Sample ID Tank 102 Jebro Inc ULO

Tag Number:

Collection Date: 11/2/2021 2:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
LIST 1						
METALS ANALYSIS IN OIL (6010)				SW6010		Analyst: MSK
Arsenic(As)	< 1.00	1.00		ppm	1	11/3/2021 3:17:48 PM
Cadmium(Cd)	0.682	0.100		ppm	1	11/3/2021 3:17:48 PM
Chromium(Cr)	4.11	4.00		ppm	1	11/3/2021 3:17:48 PM
Lead(Pb)	3.84	1.00		ppm	1	11/3/2021 3:17:48 PM
LIST 1						
PERCENTAGE OF ASH IN PETROLEUM PRODUCTS (D-482)				ASTM-D482		Analyst: TAH
Ash	0.75	0.10		%	1	11/3/2021 4:31:12 PM
LIST 1						
CALCULATION OF BTU'S PER GALLON (D-240)				ASTM-D240		Analyst: TAH
BTU/gal	121791			BTU/gal	1	11/3/2021 3:44:16 PM
LIST 1						
DETERMINATION OF HEAT OF COMBUSTION (D-240)				ASTM-D240		Analyst: TAH
BTU/lb	16394			BTU/lb	1	11/3/2021 3:44:16 PM
LIST 1						
FLASHPOINT DETERMINATION (1010)				SW1010		Analyst: TAH
Flash Point	182			°F	1	11/3/2021 1:58:02 PM
LIST 1						
% WATER FROM KARL FISHER COULORMETER (D-6304)				ASTM-D6304		Analyst: TAG
Water	9.73	0.0100		wt%	1	11/3/2021 3:28:05 PM
LIST 1						
PERCENT SULFUR BY X-RAY (D-4294)				ASTM-D4294		Analyst: TAH
% Sulfur	0.1610	0.1000		%	1	11/3/2021 1:55:40 PM
LIST 1						
PCB ANALYSIS FOR OILS (8082)				SW8082		Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/3/2021 1:43:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110238

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110238-006A
Project:
Client Sample ID Tank 103

Tag Number:
Collection Date: 11/3/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082	Analyst: JAP	
Total PCBs	< 1.00	1.00		ppm	1	11/4/2021 12:31:00 PM
Surr: Tetrachloro-m-xylene	83.5	67.8 - 130		%Rec	1	11/4/2021 12:31:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110805

Date Reported: 11/12/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110805-007A
Project:
Client Sample ID ULO tk 103

Tag Number:
Collection Date: 11/10/2021 3:15:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	< 1.00	1.00		ppm	1	11/12/2021 2:23:00 PM
Surr: Tetrachloro-m-xylene	77.2	67.8 - 130		%Rec	1	11/12/2021 2:23:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110940

Date Reported: 11/15/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110940-007A
Project:
Client Sample ID ULO, Tank 104

Tag Number:
Collection Date: 11/12/2021 1:30:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	< 1.00	1.00		ppm	1	11/15/2021 12:04:00 PM
Surr: Tetrachloro-m-xylene	74.1	67.8 - 130		%Rec	1	11/15/2021 12:04:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range	Original
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response	
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds	
	ND	Not Detected	OG1		
	P	Second column confirmation exceeds	PL	Permit Limit	
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit	



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Analytical Report

(base report)

WO#: 21110805

Date Reported: 11/12/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110805-003A
Project:
Client Sample ID ULO tk 105

Tag Number:

Collection Date: 11/10/2021 1:45:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	< 1.00	1.00		ppm	1	11/12/2021 1:14:00 PM
Surr: Tetrachloro-m-xylene	77.7	67.8 - 130		%Rec	1	11/12/2021 1:14:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OGI	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110238

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.

Tag Number:

Matrix: OIL

Collection Date: 11/3/2021 1:00:00 PM

Lab ID: 21110238-007A

Project:

Client Sample ID Tank 201

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)					SW8082	Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/4/2021 12:49:00 PM
Surr: Tetrachloro-m-xylene	83.8	67.8 - 130		%Rec	1	11/4/2021 12:49:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OGI	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110238

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110238-002A
Project:
Client Sample ID Tank 202

Tag Number:
Collection Date: 11/3/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082	Analyst: JAP	
Total PCBs	< 1.00	1.00		ppm	1	11/4/2021 11:54:00 AM
Surr: Tetrachloro-m-xylene	81.3	67.8 - 130		%Rec	1	11/4/2021 11:54:00 AM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OGI	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110238

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110238-003A
Project:
Client Sample ID Tank 203

Tag Number:
Collection Date: 11/3/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	< 1.00	1.00		ppm	1	11/4/2021 12:12:00 PM
Surr: Tetrachloro-m-xylene	71.1	67.8 - 130		%Rec	1	11/4/2021 12:12:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range	Original
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response	
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds	
	ND	Not Detected	OGI		
	P	Second column confirmation exceeds	PL	Permit Limit	
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit	



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Analytical Report

(base report)

WO#: 21110351

Date Reported: 11/5/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110351-002A
Project:
Client Sample ID Tank 203 RFO

Tag Number:
Collection Date: 11/4/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082	Analyst: JAP	
Total PCBs	< 1.00	1.00		ppm	1	11/5/2021 12:22:00 PM
Surr: Tetrachloro-m-xylene	70.8	67.8 - 130		%Rec	1	11/5/2021 12:22:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110238

Date Reported: 11/4/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110238-004A
Project:
Client Sample ID Tank 301

Tag Number:
Collection Date: 11/3/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	< 1.00	1.00		ppm	1	11/4/2021 12:12:00 PM
Surr: Tetrachloro-m-xylene	85.1	67.8 - 130		%Rec	1	11/4/2021 12:12:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
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	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110805

Date Reported: 11/12/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110805-001A
Project:
Client Sample ID RFO5L/H, Processing tk

Tag Number:
Collection Date: 11/10/2021 1:30:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)			SW8082		Analyst: JAP	
Total PCBs	< 1.00	1.00		ppm	1	11/12/2021 12:40:00 PM
Surr: Tetrachloro-m-xylene	75.2	67.8 - 130		%Rec	1	11/12/2021 12:40:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OGI	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

Original

Appendix

C



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Analytical Report

(base report)

WO#: 21110351

Date Reported: 11/5/2021

CLIENT: JEBRO, Inc.

Matrix: OIL

Lab ID: 21110351-005A

Project:

Client Sample ID RFO5L/H Loadout #297428 from tank 201 and 202

Tag Number:

Collection Date: 11/4/2021 1:00:00 PM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)					SW8082	Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/5/2021 12:41:00 PM
Surr: Tetrachloro-m-xylene	78.5	67.8 - 130		%Rec	1	11/5/2021 12:41:00 PM

Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range	
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response	
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds	
	ND	Not Detected	OG1		
	P	Second column confirmation exceeds	PL	Permit Limit	Original
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit	



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Analytical Report

(base report)

WO#: 21110482

Date Reported: 11/8/2021

CLIENT: JEBRO, Inc.
Matrix: OIL
Lab ID: 21110482-003A
Project:

Tag Number:

Collection Date: 11/5/2021 6:00:00 AM

Client Sample ID RFO5L/H Loadout 297444Tanks 202/203 Tri311

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)					SW8082	Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/8/2021 12:53:00 PM
Surr: Tetrachloro-m-xylene	68.6	67.8 - 130	m	%Rec	1	11/8/2021 12:53:00 PM

Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OGI	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110546

Date Reported: 11/9/2021

CLIENT: JEBRO, Inc.

Matrix: OIL

Lab ID: 21110546-003A

Project:

Client Sample ID RFO5L/H, Load ID 297493, Trl #283

Tag Number:

Collection Date: 11/6/2021 9:30:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)					SW8082	Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/9/2021 1:51:00 PM
Surr: Tetrachloro-m-xylene	70.8	67.8 - 130		%Rec	1	11/9/2021 1:51:00 PM

Shipped out of Rack 2

Qualifiers:

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MC Value is below Minimum Compound Limit.
ND Not Detected
P Second column confirmation exceeds
R RPD outside accepted recovery limits

E Value above quantitation range
M Manual Integration used to determine area response
N Tentatively identified compounds
OGI
PL Permit Limit
RL Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110546

Date Reported: 11/9/2021

CLIENT: JEBRO, Inc.

Tag Number:

Matrix: OIL

Collection Date: 11/8/2021 7:00:00 AM

Lab ID: 21110546-005A

Project:

Client Sample ID RFO5L/H, Load ID 297497, Tk 203, Trl #311

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)					SW8082	Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/9/2021 2:09:00 PM
Surr: Tetrachloro-m-xylene	70.8	67.8 - 130		%Rec	1	11/9/2021 2:09:00 PM

Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OGI	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110546

Date Reported: 11/9/2021

CLIENT: JEBRO, Inc.

Matrix: OIL

Lab ID: 21110546-004A

Project:

Client Sample ID RFO5L/H, Load ID 297506, Tk 201, Trl #302

Tag Number:

Collection Date: 11/8/2021 6:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)						Analyst: JAP
				SW8082		
Total PCBs	< 1.00	1.00		ppm	1	11/9/2021 1:51:00 PM
Surr: Tetrachloro-m-xylene	71.1	67.8 - 130		%Rec	1	11/9/2021 1:51:00 PM

Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110585

Date Reported: 11/10/2021

CLIENT: JEBRO, Inc. Tag Number:
Matrix: OIL Collection Date: 11/9/2021 11:30:00 AM
Lab ID: 21110585-005A
Project:
Client Sample ID RFO5L/H Load ID 297561, Trailer 276

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082		Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/10/2021 2:38:00 PM
Surr: Tetrachloro-m-xylene	70.0	67.8 - 130		%Rec	1	11/10/2021 2:38:00 PM

Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110689

Date Reported: 11/11/2021

CLIENT: JEBRO, Inc.

Tag Number:

Matrix: OIL

Collection Date: 11/10/2021 4:00:00 AM

Lab ID: 21110689-004A

Project:

Client Sample ID RFO5L/H, Load ID 297593, Trailer 276

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082		Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/11/2021 3:00:00 PM
Surr: Tetrachloro-m-xylene	73.3	67.8 - 130		%Rec	1	11/11/2021 3:00:00 PM

Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110689

Date Reported: 11/11/2021

CLIENT: JEBRO, Inc.

Matrix: OIL

Lab ID: 21110689-003A

Project:

Client Sample ID RFO5L/H, Load ID 297594, Trailer 311

Tag Number:

Collection Date: 11/10/2021 4:30:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082		Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/11/2021 2:42:00 PM
Surr: Tetrachloro-m-xylene	76.3	67.8 - 130		%Rec	1	11/11/2021 2:42:00 PM

Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range	Original
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response	
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds	
	ND	Not Detected	OG1		
	P	Second column confirmation exceeds	PL	Permit Limit	
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit	



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Analytical Report

(base report)

WO#: 21110689

Date Reported: 11/11/2021

CLIENT: JEBRO, Inc.

Matrix: OIL

Lab ID: 21110689-002A

Project:

Client Sample ID RFO5L/H, Load ID 297584, Trailer 278

Tag Number:

Collection Date: 11/10/2021 6:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)				SW8082		Analyst: JAP
Total PCBs	< 1.00	1.00		ppm	1	11/11/2021 2:42:00 PM
Surr: Tetrachloro-m-xylene	73.0	67.8 - 130		%Rec	1	11/11/2021 2:42:00 PM

✓ Shipped out of Rack 2

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110585

Date Reported: 11/10/2021

CLIENT: JEBRO, Inc.

Tag Number:

Matrix: OIL

Collection Date: 11/9/2021 11:00:00 AM

Lab ID: 21110585-004A

Project:

Client Sample ID ULO, Common line sample between tk 19 and dehy

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	< 1.00	1.00		ppm	1	11/10/2021 2:20:00 PM
Surr: Tetrachloro-m-xylene	77.4	67.8 - 130		%Rec	1	11/10/2021 2:20:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110585

Date Reported: 11/10/2021

CLIENT: JEBRO, Inc.

Tag Number:

Matrix: OIL

Collection Date: 11/9/2021 12:00:00 PM

Lab ID: 21110585-006A

Project:

Client Sample ID RFO, Line Sample tk 36 to tk 4 manifold

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	16.2	1.00		ppm	1	11/10/2021 2:38:00 PM
Surr: Tetrachloro-m-xylene	76.6	67.8 - 130		%Rec	1	11/10/2021 2:38:00 PM

This section of transfer line/pipe
to be cleaned by Amerapex.

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OGI	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Analytical Report

(base report)

WO#: 21110585

Date Reported: 11/10/2021

CLIENT: JEBRO, Inc.

Tag Number:

Matrix: OIL

Collection Date: 11/9/2021 12:00:00 PM

Lab ID: 21110585-007A

Project:

Client Sample ID RFO, tk 36 to tk 19 common line sample

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
PCB ANALYSIS FOR OILS (8082)		SW8082		Analyst: JAP		
Total PCBs	< 1.00	1.00		ppm	1	11/10/2021 2:56:00 PM
Surr: Tetrachloro-m-xylene	69.5	67.8 - 130		%Rec	1	11/10/2021 2:56:00 PM

Qualifiers:	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	M	Manual Integration used to determine area response
	MC	Value is below Minimum Compound Limit.	N	Tentatively identified compounds
	ND	Not Detected	OG1	
	P	Second column confirmation exceeds	PL	Permit Limit
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit

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Appendix

E



Summary Activities to be performed on Contaminated Pipe Cleaning

Known Contaminant – PCB's

Pipe Size – 4"

Length – Approx. 450'

- Pre – Job:
 - Review and Approve Site Safety Plan
 - SDS Review
 - PPE Requirements
 - Respiratory Requirements
 - Emergency Action Plan to include Site and Local Facilities Addresses and Phone numbers
 - Read and Sign Off on Job Plan for Cleaning and Removal of all Contaminated Oil in Designated Piping.
- Job Execution:
 - Mobilize Equipment to Site
 - Conduct Initial Safety Stand Down with Crew & Facility Management Team
 - Fill out Daily JSA (Job Safety Analysis) and review with Crew
 - Set Up Contamination Zones and De-Con Facility
 - Pre-Check All Hydroblasting & Vacuum Equipment That will be Running on site.
 - Install Blast Bags (Flange Wraps) over Valves being removed and / or being used for Entry Point(s) and/or Discharge Points. (See Attachment for Blast Bag)
 - Set-up Catch Troughs under Valves for Secondary Containment
 - Hook Up Initial Blow Down Hose to Entry Point and prepare for Initial Clean
 - Set up Discharge Side of Blow Down on Opposite end of Piping to Frac Tank Hose.
 - Open Valve on Entry Point and Fill Line to Pressure Point that will be Pre-Determined (Low Pressure) prior to Job and noted in Job Plan.
 - Charge line and release pressure several times to achieve an initial Clean.
 - Once Line has reached the Initial Clean, Remove the High-Pressure Hose from Entry Point.



- Attach Rotating Hose Device (RHD) with Water Diversion **Valve** and Packing Gland Attachment to flange.
- Open Discharge End
- Hook Up Transfer Pump hose to Bottom side Water Diversion Valve
- Insert Nozzle into Packing Gland Valve
- Tighten Packing Gland around hydroblasting hose (to prevent contaminated water from flowing back out of Cleaning System)
- Begin Water Blasting with 20K PSI Water.
- While Cleaning – All Water from Pipe will be Continuously Vacuumed out through both Ends of Pipe utilizing Diaphragm Pumps that will be discharging water to Frac Tank.
- Once Level of Cleanliness is achieved. All Hydroblasting will stop and all hoses going to Frac Tank will be flushed with water and then air, to clean as best as possible before disconnecting.
- Post Job
 - When Pipe is Clean – All Hoses will be disconnected and De-Contaminated at the De-con Station.
 - All Contaminated PPE will be drummed up and the responsibility of the Customer to Dispose
 - All Contaminated Water in Frac Tanks will be left on site and left up to the Customer for Disposal
 - When Water has been hauled off and Frac Tanks(s) has been emptied – Frac Tank will be decontaminated and last load of contaminated water can be hauled off with Vac Truck.

End of Job